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7  
8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
9 **STATE OF CALIFORNIA**

10  
11 In the Matter of the Accusation Against:

Case No.

2011-74

12 **ERIKA CONCEPCION DORATI**  
1765 N. Oxford Avenue  
13 Pasadena, CA 91104  
14 **Registered Nurse License No. 688313**

**ACCUSATION**

Respondent.

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17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her  
20 official capacity as the Interim Executive Officer of the Board of Registered Nursing, State of  
21 California.

22 2. On or about September 7, 2006, the Board of Registered Nursing (Board) issued  
23 Registered Nurse License Number 688313 to Erika Concepcion Dorati (Respondent). The  
24 Registered Nurse License was in full force and effect at all times relevant to the charges brought  
25 herein and will expire on January 31, 2012, unless renewed.

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1 **COST RECOVERY**

2 8. Section 125.3 provides, in pertinent part, that the Board may request that the  
3 administrative law judge to direct a licensee found to have committed a violation or violations of  
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
5 enforcement of the case.

6 **CAUSE FOR DISCIPLINE**

7 **(Conviction of a Substantially-Related Crime)**

8 9. Respondent is subject to disciplinary action under section 2761, subdivision (f), in  
9 conjunction with California Code of Regulations, title 16, section 1444, in that Respondent has  
10 been convicted of a crime that is substantially related to the qualifications, functions, and duties  
11 of a registered nurse. On or about January 26, 2009, after pleading nolo contendere, Respondent  
12 was convicted of one misdemeanor count of violating Penal Code section 243, subdivision (e)(1)  
13 [battery on a former spouse] in the criminal proceeding entitled *The People of the State of*  
14 *California v. Erika Concepcion Dorati* (Super. Ct. Los Angeles County, 2009, No. 9PS00202).  
15 Respondent was ordered to complete a 52-week domestic violence program. The underlying  
16 circumstances occurred on or about December 24, 2008, when Respondent was arrested after  
17 striking her former spouse in the back of the head during a custody exchange involving their  
18 daughter.

19 **PRAYER**

20 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
21 and that following the hearing, the Board of Registered Nursing issue a decision:

22 1. Revoking or suspending Registered Nurse License Number 688313, issued to  
23 Respondent;

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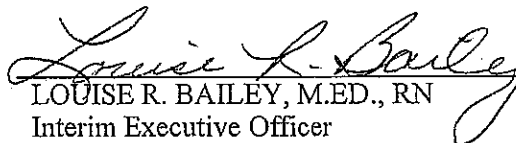
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1           2.    Ordering Respondent to pay the Board the reasonable costs of the investigation and  
2 enforcement of this case, pursuant to section 125.3; and

3           3.    Taking such other and further action as deemed necessary and proper.  
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7 DATED: \_\_\_\_\_

7/23/10

  
LOUISE R. BAILEY, M.ED., RN  
Interim Executive Officer  
Board of Registered Nursing  
State of California  
State of California  
*Complainant*

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